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US EPA RECORDS CENTER REGION 5



466681

TELEPHONE

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AREA CODE 216

February 1, 1980

Mr. Ken Harsh  
Assistant Chief, Emergency Response  
Ohio Environmental Protection Agency  
361 East Broad Street  
Columbus, OH 43215

Re: Chemical Recovery Systems, Inc.

Dear Mr. Harsh:

I enjoyed speaking with you on the telephone on January 25, 1980, and certainly appreciate your cooperation and help in this matter.

To confirm our discussion, I believe you stated it was not your intention to require Chemical Recovery Systems, Inc. to close down its operation in Elyria but that you felt the following areas could pose pollution problems and require immediate attention:

1. The sumps beneath both stills operating on the premises, which are of cinder block construction, should be replaced or sealed as to prevent seepage of any solvents into the soil.
2. Some sort of catch basin should be installed beneath the drum crusher as to prevent any solvents from soaking into the soil.
3. At the point along the river bank adjacent to the subject property where chemicals are seeping from the soil into the river, some apparatus should be installed to contain semi-solid materials being discharged into the river.

4. I believe you also stated that you wanted a commitment from Chemical Recovery that the EPA would be notified immediately in the event of any chemical spills on its property.

I have reviewed our conversation in detail with Mr. James Freeman, President of Chemical Recovery Systems, Inc., and can submit to you the following information regarding your areas of concern.

As you are aware, there are two stills operating on the subject premises, one of which is located adjacent to the river bank and the other of which is located near the road and at a higher point on the property. Hereinafter I will refer to these as the "lower" and "upper" stills respectively. The sump located beneath the upper still was formerly of block construction and seepage of solvents could occur. However, this sump has been removed and replaced with a new sump consisting of a glazed clay tile crock, the bottom of which is sealed with hydraulic concrete. The sump beneath the lower still, formerly of block construction, has been removed and the floor has been covered over with a concrete pad which is impervious to solvents. Solvents which are used in this lower still will be directly pumped into appropriate containers and hauled away.

The request that a concrete catch basin be installed beneath the drum crusher on the property appears to be moot at this time by reason of the fact that the drum crusher has been removed from the premises. However, Mr. Freeman assured me that, in the event he should install another drum crusher, he will comply with the requirement for a concrete catch basin and will contact you in advance to determine proper construction therefor.

Regarding the discharge of semi-solids at a point along the river bank, a "slick-bar" has been installed at that point by the company. Mr. Freeman indicated that this type of apparatus was suggested by an EPA representative who viewed the premises at some time in the past. Further, Mr. Freeman points out that it is his belief that the semi-solids which are discharging from the soil along the river bank consist of some sort of vinyl material deposited in the soil many years ago by his company's predecessor. The recent discharge has been caused by solvents escaping from the sump beneath the lower still, seeping into the soil and loosening this material present therein. Mr. Freeman is hopeful that the discharge problem will be alleviated by his having removed the sump beneath the lower still and sealed the area under the still.

I have made Mr. Freeman aware of your request that the EPA be notified in the event of any spills and he has assured me that he will make such notification immediately in the event any spills occur.

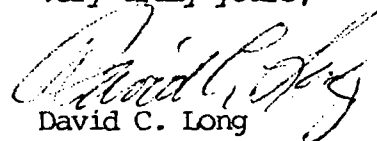
Mr. Ken Harsh  
Ohio Environmental Protection Agency

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Again, I certainly appreciate your help in this matter and appreciate your willingness to extend the time set forth for response in Mr. McAvoy's letter of January 23, 1980. This request for a time extension is due to scheduling constraints of my office only and not my client.

Very truly yours,



David C. Long

DCL/ams

cc:

James F. McAvoy, Director, OEPA  
Joseph Connolly, Senior Deputy Director, OEPA  
Peggy Vince, Steve White, OAPC, OEPA  
Ken Schultz, ER, OEPA  
Sidney Stern, Legal, OEPA  
Don Day, OLPC, OEPA  
James Riddell, NEDO, OEPA  
James Freeman, President, Chemical Recovery Systems, Inc.